

LACORTE, BUNDY, VARADY & KINSELLA
989 Bonnel Court
Union, New Jersey 07083
(908) 810-0500
Attorneys for Defendants, Elizabeth Police Department

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KHASEEM GREENE,

Plaintiff,

vs.

ELIZABETH POLICE DEPARTMENT; ALFONSO
COLON; JAMES SZPOND; UNION COUNTY
PROSECUTOR'S OFFICE; PARTICIA CRONIN;
STEPHEN KAISER; DEBORAH WHITE; MARK
SPIVEY; JOHN/JANE DOES 1 through 10,

Defendants.

Civil Action No. 2:18-cv-08972

AFFIDAVIT

STATE OF NEW JERSEY:

COUNTY OF UNION:

Robert F. Varady, Esq., being duly sworn, upon his oath deposes and says:

1. I am an attorney at law in the State of New Jersey and am a Partner of the law firm LaCorte, Bundy, Varady & Kinsella.
2. I have been entrusted with the defense of the above captioned matter and am fully familiar with the facts set forth herein.
3. I make this affidavit pursuant to Local Civil Rule 5.3.

4. The nature of the materials that are to be confidential deal with personnel files of plaintiff, employment records, and medical records. The privacy interest of plaintiff Greene is a legitimate interest which warrants confidentiality.
5. If the aforementioned records were not deemed to be confidential the privacy interest of the plaintiff could be violated.
6. During a telephone status conference with United States Magistrate Judge Cathy Waldor, the attorneys agreed to the entry of a Discovery Confidentiality Order.
7. It is for the aforementioned reasons that the parties respectfully request that the Court enter said Order.

Respectfully submitted:

s/Robert F. Varady

Robert F. Varady

Sworn to and subscribed
before me this ____ day of September 2019

United States Magistrate Judge Cathy Waldor